



Philip A. Craig, Executive Director
An Affiliate of The American Beverage Licensees

February 6, 2012

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Re: IB 11-109 LightSquared's Petition for Declaratory Ruling

Dear Chairman Genachowski:

Thank you for the opportunity to submit comments in support of LightSquared's proposed mobile broadband network.

The Ohio Licensed Beverage Association represents small business owners throughout Ohio. Many of our members are located in rural areas of Ohio, including Appalachia. These areas, in particular, do not have many options for mobile broadband access. LightSquared could change that. The company's proposed network would spur competition and innovation in the wireless industry while expanding the nation's wireless broadband capacity and reaching underserved communities – all without a penny of taxpayer money. The numerous benefits increased broadband access offers to not only member of the OLBA throughout Ohio, but Americans all over the country, are too great to let this opportunity pass due to outdated and unfair policies.

From all I have read, it appears abundantly clear that LightSquared has followed all of the regulatory procedures and processes for over a decade as it prepared to launch its network. When interference concerns have been raised, the company has taken steps to address them – all in an effort to peacefully co-exist with existing technologies like GPS devices.

However, now it is time for the FCC to take an active role in enforcing spectrum rights among the many users, including LightSquared and GPS. My understanding is that commercial GPS receivers are not licensed to operate outside of GPS-allocated spectrum and if they do in fact encroach upon adjacent spectrum, then GPS manufacturers should utilize filters to deal with interference. America needs as much suitable spectrum for mobile broadband brought online quickly and we cannot let encroaching devices prevent future progress.

As the owner of a heavily regulated business that requires a license to operate, I am expected to follow the confines of that license. In my case, my liquor permit is only good for the address and premises as defined in the permit. Here, LightSquared appears to be asking for the same thing . . . except another entity is encroaching on their "premises." Just as my liquor permit is critical to the success of my business at my location, so are the rights to the spectrum LightSquared has long held.

I sincerely hope the FCC will quickly rule on this petition to provide some clarity and pave the way for LightSquared to commence operations in the spectrum it is licensed to use.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen E. Bean". The signature is fluid and cursive, with the first name "Kathleen" and last name "Bean" being more legible than the middle initial "E".

Kathleen E. Bean
President

cc: Assistant Secretary Lawrence Strickling, NTIA